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9 Attorneys for Defendants  
SAMSUNG SDI CO., LTD. and  
10 SAMSUNG SDI AMERICA, INC.

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION  
14

15 In re: TFT-LCD (FLAT PANEL)  
16 ANTITRUST LITIGATION

MDL File No. 3:07-md-1827 SI

Case No. 3:09-cv-5609 SI

17 This Document Relates to:

MDL No. 1827

18 NOKIA CORPORATION and NOKIA INC.,

19 Plaintiffs,

**STIPULATION AND [PROPOSED]  
ORDER RE SURREPLY EXPERT  
REPORTS AND DEPOSITIONS**

20 vs.

21 AU OPTRONICS CORPORATION, et al.,

22 Defendants.  
23  
24  
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26  
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1 The undersigned counsel, on behalf of defendants Samsung SDI Co., Ltd., Samsung  
2 SDI America, Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba  
3 Corporation, Toshiba Mobile Display Co., Ltd., Toshiba America Electronic Components,  
4 Inc., Toshiba America Information Systems, Inc., Samsung Electronics Co., Ltd., Samsung  
5 Semiconductor, Inc., Samsung Electronics America, Inc., Hitachi, Ltd., Hitachi Electronic  
6 Devices (USA), Inc., and Hitachi Displays, Ltd. (n/k/a Japan Display East, Inc.)  
7 (collectively "Defendants") and plaintiffs Nokia Corp. and Nokia Inc. (collectively  
8 "Plaintiffs") hereby stipulate as follows:

9 WHEREAS, the Court on July 14, 2011 entered an order modifying the pretrial  
10 schedule for "Track One" actions, including the above-titled action, which set forth dates  
11 for service of expert reports and a date for the close of expert discovery (Dkt. No. 3110);

12 WHEREAS, the Special Master on March 15, 2012 entered an order extending to  
13 May 11, 2012 the deadline for direct action plaintiffs to submit their reply expert reports  
14 (Dkt. No. 5161);

15 WHEREAS, pursuant to that schedule, as modified, Plaintiffs served an expert  
16 report for Dr. Helen Jenkins; Defendants served opposition expert reports; and Plaintiffs  
17 served a reply expert report for Dr. Jenkins ("Jenkins Reply Report");

18 WHEREAS, Defendants contend that the Jenkins Reply Report contains new  
19 analysis not previously disclosed;

20 WHEREAS, Defendants seek to serve one or more reports, from their previously  
21 disclosed experts, responding to this new analysis ("Surreply Reports");

22 WHEREAS, the parties seek to make mutually agreeable and orderly arrangements  
23 for disclosure of the Surreply Reports and depositions of experts who submit Surreply  
24 Reports;

25 NOW, THEREFORE, the Parties agree as follows:

- 26 1. Defendants will serve Surreply Reports by July 20, 2012;
- 27 2. Defendants will serve any backup data, code or other information required

1 by Federal Rule of Civil Procedure Rule 26(a)(2)(B) by July 25, 2012;

2 3. Plaintiffs may depose any expert submitting a Surreply Report concerning  
3 the contents of that report on or before August 20, or other mutually agreeable date.

4 The parties respectfully request that this stipulation be entered as an order of the  
5 Court.

6  
7 Dated: July 2, 2012

By: /s/ Tyler M. Cunningham

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13 *Attorneys for Defendants*  
14 *Samsung SDI America, Inc, and*  
15 *Samsung SDI Co., Ltd.,*

16 *Also filed on behalf of Defendants Sharp*  
17 *Corporation, Sharp Electronics Corporation,*  
18 *Toshiba Corporation, Toshiba Mobile Display*  
19 *Co., Ltd., Toshiba America Electronic*  
20 *Components, Inc., Toshiba America Information*  
21 *Systems, Inc., Samsung Electronics Co., Ltd.,*  
22 *Samsung Semiconductor, Inc., Samsung*  
23 *Electronics America, Inc., Hitachi, Ltd., Hitachi*  
24 *Electronic Devices (USA), Inc., and Hitachi*  
25 *Displays, Ltd. (n/k/a Japan Display East, Inc.)*

By: /s/ B. Parker Miller

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*Attorneys for Plaintiffs  
Nokia Corp. and Nokia Inc.,*

Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this document has been obtained from each of the above signatories.

**IT IS SO ORDERED.**

Dated: 7/2/, 2012



Hon. Susan Illston, United States District Judge